

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ZAKUNDA-ZE HANDBERRY, et al.,	X
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Plaintiffs,	: 96 Civ. 6161 (GBD)
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against	:
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WILLIAM C. THOMPSON, JR., et al.,	:
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Defendants.	:
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	:
	X

**DECLARATION OF DANIEL M. STONE IN SUPPORT OF  
PLAINTIFFS' MEMORANDUM OF LAW IN OPPOSITION TO CITY  
DEFENDANTS' MOTION TO PARTIALLY TERMINATE PROSPECTIVE  
RELIEF**

Daniel M. Stone declares pursuant to 28 U.S.C. § 1746, as follows:

1. I am an associate with the law firm of Paul, Weiss, Rifkind, Wharton & Garrison, LLP, located at 1285 Avenue of the Americas, New York, New York 10019, counsel to Plaintiffs. I am admitted to practice law before the United States District Court for the Southern District of New York. I have personal knowledge of the facts set forth in this declaration, which is submitted in support of Plaintiffs' Memorandum of Law in Opposition to the City Defendants' Motion to Partially Terminate Prospective Relief (the "Opposition").

2. The following documents relevant to the Opposition are attached:

3. Exhibit A is a true and correct copy of the press release, *Mayor de*

## *Blasio Announces Sea Change in Juvenile Justice as the Age of Criminal Responsibility*

*is Raised to 18 Years Old. available at* [\*https://www1.nyc.gov/office-of-the-mayor/news/495-18/mayor-de-blasio-sea-change-juvenile-justice-the-age-criminal-responsibility-is.\*](https://www1.nyc.gov/office-of-the-mayor/news/495-18/mayor-de-blasio-sea-change-juvenile-justice-the-age-criminal-responsibility-is)

4. Exhibit B is a true and correct copy of Rosa Goldensohn's article, *With Rikers closure still years off, de Blasio backs away from young adult reforms.* Politico.com (September 6, 2018), available at <https://www.politico.com/states/new-york/albany/story/2018/09/05/with-rikers-closure-still-years-off-de-blaasio-backs-away-from-young-adult-reforms-594152>.

5. Exhibit C is a true and correct copy of the Department of Correction's Young Adult Housing Monthly Progress Reports for 18 year olds and 19-21 year olds of October 2018, available at [https://www1.nyc.gov/assets/boc/downloads/pdf/Reports/DOC-Reports/18\\_yo\\_census\\_october\\_2018.pdf](https://www1.nyc.gov/assets/boc/downloads/pdf/Reports/DOC-Reports/18_yo_census_october_2018.pdf) (18 year old census); [https://www1.nyc.gov/assets/boc/downloads/pdf/Reports/DOC-Reports/19\\_21\\_yo\\_census\\_october\\_2018.pdf](https://www1.nyc.gov/assets/boc/downloads/pdf/Reports/DOC-Reports/19_21_yo_census_october_2018.pdf) (19-21 year old census).

6. Exhibit D is a true and correct copy of Jan Ransom's article, *Teenagers Were Moved Off Rikers for Safety. Their Brawls Came, Too.* N.Y. Times (Oct. 4, 2018), available at <https://nyti.ms/2O74HKx>.

7. Exhibit E is a true and correct copy of Stephanie Pagones's article, *Juvenile Center Teacher Says Teens Have Sent Furniture Flying.* N.Y. Post (Oct. 5, 2018, 10:10 PM), available at <https://nypost.com/2018/10/05/juvenile-center-teacher-says-teens-have-sent-furniture-flying>.

8. Exhibit F is a true and correct copy of the article by the Daily News Editorial Board, *Youthful Mistakes: Raise the Age Endures Growing Pains*. (Oct. 6, 2018, 4:05 AM), available at <http://www.nydailynews.com/opinion/ny-edit-raise-the-age-20181004-story.html>.

9. Exhibit G is a true and correct copy of Aliza Chasan's and Dan Mannarino's article, *16 Correction Officers, 2 Captains Injured in Massive Brawl at Bronx Juvenile Center*, PIX 11 (Oct. 7, 2018), available at <https://pix11.com/2018/10/07/16-correction-officers-2-captains-injured-in-massive-brawl-at-bronx-juvenile-center>.

10. Exhibit H is a true and correct copy of Spectrum News Staff's article, *Union: 18 Correction Officers Hurt Breaking Up Fight at Bronx Juvenile Facility*. Spectrum News (Oct. 7, 2018, 6:28 PM), available at <http://www.ny1.com/nyc/all-boroughs/news/2018/10/07/correction-officers-hurt-at-horizon-juvenile-center-bronx-nyc-correction-officers-benevolent-association-says>.

11. Exhibit I is a true and correct copy of Sarah Wallace's article, *New Video Shows Melee in NYC Juvenile Center that Left 21 Officers Hurt*. NBC New York (Oct. 4, 2018, 6:35 PM), available at <https://www.nbcnewyork.com/news/local/Horizon-Center-Juvenile-Center-Melee-Fight-NYC-New-York-495189791.html>.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 26, 2018  
New York, NY



Daniel M. Stone